

May 10, 2012

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 6576

RECEIVED
FEDERAL ELECTION COMMISSION
2012 MAY 16 PM 1:45
OFFICE OF GENERAL COUNSEL

Re: Violations of the Federal Election Campaign Act by Wright McLeod for Congress

I am in possession of information that gives rise to serious questions about possible violations of the Federal Election Campaign Act (the "Act") and Federal Election Commission regulations by Wright McLeod for Congress. These allegations include stealing donor information from an opponent's campaign, the acceptance of excessive contributions, and failing to accurately and sufficiently disclose campaign expenditures. The sheer volume and pattern of these violations suggest that the McLeod campaign is either incompetent or willfully disregarding the law—a troubling truth for a practicing attorney who now wishes to be entrusted with the public duty of making the laws. We urge the Commission to immediately investigate these matters fully and take any and all action necessary to remedy these violations and prevent additional violations of the law.

Violation #1: Stealing Donor Information

It has come to my attention that the McLeod campaign has used Rick W. Allen for Congress's proprietary donor information, most likely violating federal law by stealing this information from campaign finance reports filed with the Commission. I serve as the campaign manager for Rick W. Allen for Congress, and I am aware that Molly A Hargather and Wyche Thomas Green, Rick's daughter and son-in-law, received fundraising mail from the McLeod campaign even though these individuals have never donated to, requested information from, or been involved with the McLeod campaign. In the case of Molly Hargather, the contribution to Rick W. Allen for Congress represents her first ever campaign contribution and in the case of Wyche Thomas Green, the first campaign contribution with this spelling of his name. See attached EXHIBIT A. The more conclusive evidence, however, is the fact that the punctuation used in their names and addresses is identical to that on the Allen campaign's FEC report, which differs from how their names appear in Department of Motor Vehicles, voter registration records or any previous campaign finance reports for separate campaigns. See attached EXHIBIT B. We believe that the only way these names and addresses could have been obtained is from FEC reports filed by the Allen campaign. As you know, it is a violation of federal law and Commission regulations to use the campaign finance reports of another committee for

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fundraising purposes. 11 C.F.R. § 104.15; 2 U.S.C. § 438 (a)(4). We believe that these facts point clearly to the fact that the McLeod campaign violated the law.

Violation #2: Acceptance of Excessive Contributions

The McLeod campaign reported in-kind contributions for rent on its April 15, 2012 Quarterly Report. For each month, four individuals (Bernard Dunstan, Margaret Dunstan, James Hull, and Barry Storey) made contributions of \$250 each for rent, totaling \$1,000 per month. Public records show that the space occupied by the McLeod campaign is 6,674 square feet, and the average rent price for comparable office space in the same area of Augusta is approximately \$11.50 per square foot per year. See attached EXHIBIT C. Therefore, the fair market value of the McLeod campaign's office space is more than \$6,000 per month, resulting in an in-kind contribution in excess of permissible contribution limits. Even if McLeod for Congress claims to use only a portion of the office space, I have knowledge that they are using far more than 1,043 square feet, which is \$1,000 per month worth of space in that area.

Based on information available in public records, it appears that the office space is owned by a Limited Liability Company ("LLC"). As part of this inquiry, we urge the Commission to investigate whether the use of the office space has been properly donated by the individual partners and not by the LLC itself, which would result in an excessive contribution from the LLC in addition to the individual members.

Violation #3: Failing to Properly Disclose Expenditures

The McLeod campaign's FEC reports show numerous violations of Commission regulations pertaining to the reporting of contributions and expenditures. These violations include:

- With respect to numerous in-kind contributions on the Year End Report 2011, the McLeod campaign does not provide a description of the disbursement. See attached EXHIBIT D.
- Several entries in the April Quarterly Report refer to "Wright McLeod for Congress Payroll." The report does not itemize the recipients of the payroll payments, nor does it identify the payee. Furthermore, it omits payments for payroll taxes, processing fees, and other associated expenses. See attached EXHIBIT E.
- The report contains numerous disbursements for office supplies and other campaign expenses that appear to be reimbursements. These expenses are not identified as reimbursements and do not identify underlying recipients who may exceed the threshold for itemization. See attached EXHIBIT F.

Conclusion

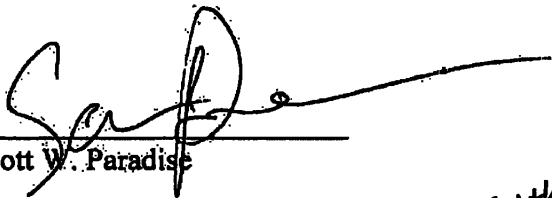
Due to the volume and pattern of these violations, which suggest either incompetence or willful disregard for the law, we urge the Commission to take actions to investigate these matters fully and to carefully review all aspects of operations of the McLeod campaign for other potential violations.

Thank you for your attention to this matter. Please do not hesitate to contact me if I can provide additional information that may be useful to the conduct of your investigation.

Respectfully submitted,

Scott W. Paradise, Complainant

I hereby swear and affirm that the facts presented in this complaint are true to the best of my knowledge, information and belief. Sworn pursuant to 18 U.S.C. §1001.



Scott W. Paradise

Subscribed and sworn to before me this 11th day of May, 2012.



Notary Public
My Commission Expires: December 27 2014

Presented by the Federal Election Commission

Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to Political Committees

GREEN, WYCHE
CARROLLTON, GA 30117

CLELAND, JOSEPH MAXWELL
VIA FRIENDS OF MAX CLELAND FOR THE US SENATE INC

12/31/2001

1000.00

22020111880

GINGREY, J. PHILLIP
VIA GINGREY FOR CONGRESS, INC.

09/04/2002

250.00

23990105849

GREEN, WYCHE
CARROLLTON, GA 30117
GREENWAY COMPANY/OWNER

GEORGIA REPUBLICAN PARTY

03/08/2006

2000.00

26940050924

GREEN, WYCHE
CARROLLTON, GA 30117
GREENWAY MEDICAL TECHNOLOGIES/PRE

WESTMORELAND, LYNN A.
VIA WESTMORELAND FOR CONGRESS

09/14/2010

1000.00

10991377068

GREEN, WYCHE
CARROLLTON, GA 30117
GREENWAY SOFTWARE

13044343375

GINGREY, J. PHILLIP**VIA GINGREY FOR CONGRESS, INC.**

10/20/2009

2400.00

10990360311**GREEN, WYCHE****CARROLLTON, GA 30117****GREENWAY SOFTWARE/PARTNER****GINGREY, J. PHILLIP****VIA GINGREY FOR CONGRESS, INC.**

08/02/2004

1000.00

24991477393

10/23/2006

1000.00

26930604032

02/05/2008

2300.00

28991354487**GREEN, WYCHE****CARROLLTON, GA 30117****GREENWAY SOFTWARE/PRESIDENT****GINGREY, J. PHILLIP****VIA GINGREY FOR CONGRESS, INC.**

06/24/2011

2500.00

11931840786**GREEN, WYCHE III****CARROLLTON, GA 30117****GREENWAY MEDICAL****CHAMBLISS, C SAXBY****VIA CHAMBLISS FOR SENATE**

03/21/2012

300.00

12020293892**GREEN, WYCHE THOMAS III****CARROLLTON, GA 30117****GREENWAY MEDICAL TECHNOLOGIES/PRE****BARROW, JOHN L.****VIA FRIENDS OF JOHN BARROW**

06/30/2010

1000.00

10990833882**GREEN, WYCHE THOMAS MR. III****CARROLLTON, GA 30117****GREENWAY MEDICAL TECHNOLOGIES/SOF****ALLEN, RICHARD W****VIA RICK W ALLEN FOR CONGRESS**

10/06/2011

2500.00

12970318479

Total Contributions: 17250.00

TRY A: NEW QUERY

RETURN TO: FEC HOME PAGE

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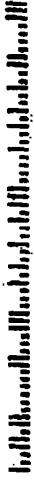
WRIGHT
McLeod★
CONGRESS
PO Box 2206
Evans, GA 30809



NORTH NETHER GA 301
24 MAR 2012 PM 3 U

Mr. Wyche Thomas Green, III
Carrollton, GA 30117

30117420443



WRIGHT
McLeod★
CONGRESS
PO Box 2206
Evans, GA 30809



NORTH NETHER GA 301
24 MAR 2012 PM 3 U

Mrs. Molly A Hargather
Atlanta, GA 30318

30318301715

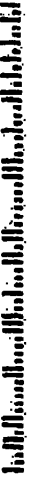


Exhibit B.



March, 2012

Mrs. Molly A Hargather

Atlanta, GA 30318

Dear :

2012 is shaping up to be one of the most important election years in our Country's history, as the outcome will shape our Nation for years, if not decades, to come. When Americans go to the polls, they will be selecting the leaders they think can save our great Nation from evolving into something our Founding Fathers could never have imagined. **I want the opportunity to be your next leader.**

I am a Republican running to replace Congressman John Barrow and to represent Georgia's new 12th District. I am a constitutional conservative, committed to strengthening national security, creating more jobs for American workers, reducing the national debt, and decreasing the size of government. I am not a professional politician, and I am not running to satisfy an ego. I am running to make a difference. As a Veteran, I am running to continue my service to my Country and to create a better future for my three children and yours.

I believe in the patriotic principle of service before self, and this principle has guided me throughout life. I graduated from the United States Naval Academy, retired as a Commander after 20 years of service, and now run a successful real estate law firm. In the Navy, I flew the F-14 Tomcat. I served in combat during Operation Desert Storm, and I have flown 53 combat missions. As a Naval Officer, an attorney, a municipal judge, and a small business owner, I have an unequalled record of leadership and service, and I know I will be the best advocate for the 12th District in D.C.

I am writing to you today to introduce myself and to ask for your help. The incumbent has served in elected office for over two decades and has built-in name recognition and financial support from the Democrats in Atlanta and Washington, D.C. John Barrow has worked hard to push President Obama's liberal agenda and he will be a tough opponent. However, with your support, we can beat him in 2012 and end the Democrats' hold over the 12th District.

To get our message out to the voters, I hope you will consider investing in the future of our great Nation by investing in me. Your financial support will enable us to spread the word directly to the voters of the 12th and ensure that a bold, courageous conservative is elected to represent you. A gift of \$500, \$250, \$100, or even \$25 can make a big difference.

I will work tirelessly to earn and keep your trust and strive to bring strong character, integrity, and leadership back to Washington, D.C.

Fly, Fight, Win,

Wright McLeod

P.S. Donations in any amount are appreciated – use the enclosed envelope and send yours in today!

P.P.S. Please visit www.WrightMcLeod.com to get more information or to make an on-line contribution.



March, 2012

Mr. Wyche Thomas Green, III

Carrollton, GA 30117

Dear Tee:

2012 is shaping up to be one of the most important election years in our Country's history, as the outcome will shape our Nation for years, if not decades, to come. When Americans go to the polls, they will be selecting the leaders they think can save our great Nation from evolving into something our Founding Fathers could never have imagined. **I want the opportunity to be your next leader.**

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Fly, Fight, Win.

A handwritten signature in dark ink, appearing to read "Wright McLeod".

Wright McLeod

P.S. Donations in any amount are appreciated – use the enclosed envelope and send yours in today!

P.P.S. Please visit www.WrightMcLeod.com to get more information or to make an on-line contribution.

— Yes, I want to send Wright to Washington, DC! Enclosed is my gift of:
☐ \$500 ☐ \$250 ☐ \$100 ☐ \$25

— No, I cannot contribute at this time, but I will support Wright's efforts.
 Please add me to your list of supporters and contact me to let me know how I can help.

Name (s) _____ Address _____
 City _____ State _____ Zip _____ Office/Home Phone _____
 Email _____ Employer _____ Occupation _____

Please make checks payable to: Wright McLeod for Congress
 PO Box 2206
 Evans, GA 30809

Credit card contributions:

Name on Card: _____ Amount to charge: _____
 Card Type: _____ Card Number: _____ Exp Date: _____
 Signature: _____

Contributions are not deductible as charitable donations for federal income tax purposes. Contributions from corporations and foreign nationals are prohibited. Federal law requires political committees to report the name, mailing address, occupation and employer for each individual whose contributions aggregate in excess of \$100 in a calendar year. The maximum an individual may contribute is \$5,000 (\$2,500 to be allocated to the primary and \$2,500 to the general.)

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Name on Card: _____ Amount to charge: _____
 Card Type: _____ Card Number: _____ Exp Date: _____
 Signature: _____

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Office Property For Lease

3515-C Wheeler Road
3515-C Wheeler Road, Augusta, GA 30909



Total Space Available: **3,500 SF**
Rental Rate: **\$3,208.33 /Month**
Property Type: **Office**
Property Sub-type: **Office Building**
Building Size: **7,000 SF**
Building Class: **B**
Year Built: **1984**
Lot Size: **3.44 AC**
Zoning Description: **B-2, General Business**
Find Out More...

Last Verified: 5/7/2012
Listing ID: 15890295

Presented by

Meybohm
COMMERCIAL PROPERTIES

Request additional information

Willard Hegan
(706) 738-0700 Ext: 2157
Contact listing broker

Name

First Name

Last Name

Email

Phone

ext

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Share on social networks

1 Space Available

Display Rental Rate as Entered

Space 1	Space Available:	3,500 SF
	Rental Rate:	\$3,208.33 /Month
	Space Type:	Office Building
	Lease Type:	Modified Gross

Description

Approximately 3,500 sq. ft. office space for lease (includes common areas and restrooms) for \$3,208.33 per month. All electric; tenant pays for utilities including % of electricity usage, % of water usage (TBD by # of occupants in each suite), telephone & internet, interior janitorial services and liability insurance. Landlord pays for garbage, landscaping, exterior building insurance and property taxes. Property is zoned B-2, General Business, per the Richmond County Planning & Zoning Department.

Building C, 3515 Wheeler Road is located adjacent to the Wheeler Road Meybohm Realtors office to the west and Gardner Cross Baptist Church on the east. It is conveniently located near the Augusta Exchange Shopping Center, Walco Way Ext., Abercorn Lane and I-520. Nearby businesses include Georgia Bank & Trust Co., Wheeler Executive Center, First Bank, Wachovia, Doctors Hospital and various other retail and commercial establishments.

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Office Property For Lease

Office Space - Wheeler Rd, Augusta, GA 30909

3665 Wheeler Rd, Augusta, GA 30909



Front View of Building

Total Space Available: 1,000 SF
 Rental Rate: \$1,000 /Month
 Property Type: Office
 Property Sub-type: Institutional/ Governmental
 Additional Sub-types: Creative/Loft, Office Building, Medical Office
 Building Size: 7,978 SF
 Building Class: A
 Year Built: 1989

[Find Out More...](#)

Last Verified 4/23/2012
 Listing ID 15534839

Presented by

Meybohm

COMMERCIAL PROPERTIES

Request additional information

Rebecca Wall, CCIM
 (706) 736-0700 Ext: 2170
 Contact listing broker

Name

First Name

Last Name

Email

Phone

ext.

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Share on social networks

1 Space Available

Display Rental Rate as Entered ▼

Suite 3-A
 Space Available: 1,000 SF
 Rental Rate: \$1,000 /Month
 Space Type: Institutional/ Governmental
 Additional Space Types: Office Building

Highlights

Near Doctors Hospital

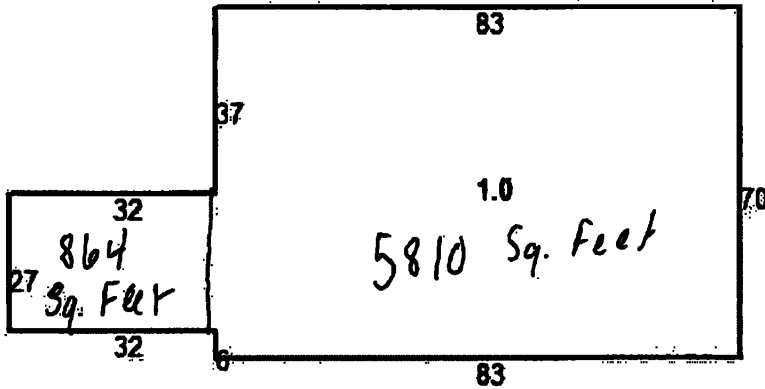
Description

Newly Renovated! Fresh Paint and New Carpet Professional Free Standing Stucco building with approx 1,000 sf office space available upper floor. Suitable for medical or professional, insurance, CPA use. Landlord responsible for water, garbage and common area maintenance. Space has 4 offices, bathroom, break area, and receptionist area. Tenant responsible for pro-rata share of taxes / insurance. Tenant responsible for electric / digital lines.

Wheeler Road near entrance to Doctors Hospital, Augusta Exchange power center, and I-20 / Bobby Jones Exp (I-520). Easy access to other areas such as Augusta Mall.

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3632 Wheeler Road Floor Plan



6,674 Sq. Feet